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C. REMARKS

Claims 1-2, 4-16, and 18-28 are pending in the present application. No claims have been amended or added. Claim 10 has been cancelled as the limitations of dependent claim 10 were previously incorporated into its base claim (independent claim 8). Reconsideration of the claims is respectfully requested.

Entry of the amendments is proper under 37 CFR §1.116 since the amendments: (a) place the application in condition for allowance (for the reasons discussed herein); (b) do not raise any new issue requiring further search or consideration (since the amendments amplify issues previously discussed throughout prosecution); (c) do not present any additional claims without canceling a corresponding number of finally rejected claims; and (d) place the application in better form for appeal, should an appeal be necessary. Entry of the amendments is thus respectfully requested.

I. Drawing Objection

Applicants note with appreciation that the Examiner has withdrawn the objection to Applicants' drawings.

II. 35 U.S.C. § 112, ¶1: Written Description

Applicants note that the Examiner has withdrawn the previous rejections under 35 U.S.C. § 112 1st paragraph and apparently has set forth a new, incomplete, rejection under this same provision. In the Examiner's Response to Arguments section, the Examiner states:

> On pages 15 and 16, Applicant (sic) argues that neither the Sun WBEM nor Tett references teach or suggest "replacing the retrieved name with the qualifier value prior to the displaying." However, upon further review of the originally filed specification, no support for this limitation could be found. Therefore, a new rejection under 35 U.S.C. § 112 is made *with further description below*. (emphasis added)

Applicants note that the Examiner did not formally set forth an objection under 35 U.S.C. § 112, 1st paragraph, as indicated in the Examiner's Response to Applicants' arguments. Despite the fact that the Examiner never formally rejected the subject limitation under 35 U.S.C. § 112, 1st paragraph, Applicants respond as follows:

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Ample support is provided in Applicants' specification for the limitation of "replacing the retrieved name with the qualifier value prior to the displaying." Applicants note that this limitation was included in Applicants' Original Claims (originally filed claims 3 and 17) and, therefore, is part of the specification. MPEP § 608.01(l) provides that Applicants' may rely on the original claims if their content justifies it:

608.01 (l) Original Claims

In establishing a disclosure, applicant may rely not only on the description and drawing as filed but also on the original claims if their content justifies it.

Where subject matter not shown in the drawing or described in the description is claimed in the application as filed, and such original claim itself constitutes a clear disclosure of this subject matter, then the claim should be treated on its merits, and requirement made to amend the drawing and description to show this subject matter. The claim should not be attacked either by objection or rejection because this subject matter is lacking in the drawing and description. It is the drawing and description that are defective, not the claim.

It is, of course, to be understood that this disclosure in the claim must be sufficiently specific and detailed to support the necessary amendment of the drawing and description.

Applicants note that the rejected limitation is quite clear in terms of detail. In fact it is the very detail found in this limitation that Applicants argued was not found in the prior art. It is also this very detail ("replacing the retrieved name with the qualifier value prior to the displaying") that the Examiner rejected as not being described in Applicants' originally filed specification. As described above, however, this limitation was included in Applicants' originally filed claims and, therefore, is part of Applicants' originally filed specification. In addition, Applicants' point to Figure 9 and the descriptions thereto that clearly show "qualifier names" that have been retrieved and replace the retrieved name (tab labels) prior to displaying the display panel (display panel 930). In addition, the flowchart on Figure 15 shows how various types of qualifier values are retrieved that are NLS (national language) specific and are used to replace the retrieved name (element name) prior to returning the "display name," which is done at the end of the flowchart (step 1585).

In light of the above response, Applicants respectfully submit that the Examiner (1) did not properly reject Applicants' claims under 35 U.S.C. § 112, 1st paragraph, (2) had no basis for rejecting Applicants' limitation under 35 U.S.C. § 112, 1st paragraph as this limitation was an originally filed claim limitation, and (3) should be withdrawn because ample support exists in Applicants' specification for this limitation. Accordingly, Applicants respectfully request that the

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Examiner withdraw the malformed rejection of Applicants' limitation "replacing the retrieved name with the qualifier value prior to the displaying."

III. Information Disclosure Statement

The Examiner stated that Applicants Information Disclosure Statement (IDS) filed 28 February 2005 failed to comply with 37 CFR 1.97, 1.98 and MPEP § 609. Applicants have filed herewith another IDS with the requisite fee re-citing references AF – AI. While Applicants are re-citing these references in a new IDS, Applicants note that enough information was properly provided in Applicants' previous IDS to allow the Examiner to readily retrieved these U.S. patent documents. In particular, for these four references, only the *last digit* of the document number was inadvertently truncated. Applicants note that much more information is provided on Form 1449 than simply the document number. Applicants correctly provided the date, name, and classification/subclass numbers for each of these references. Applicants' attorney apologizes for the typographical error. Applicants' attorney would have been more than happy to provide the last digit of these references if the Examiner had telephoned, allowing the Examiner to more easily retrieve these U.S. Patent references. Unfortunately, the Examiner never attempted to contact Applicants' representative regarding this relatively small matter.

Finally, the Examiner refused to consider reference AQ by Schmidt because the Examiner asserts that page 72 of this reference is "illegible." Applicants received a photocopy of this reference from the U.S. Patent Office on February 16, 2005 in an Examiner's Action of co-pending related application no. 10/047,312. In the copy provided to Applicants, page 72 is indeed difficult to read, albeit not "illegible." Applicants have no access to the Schmidt reference other than the copy that was provided by the U.S. Patent Office. It seems blatantly unfair for the U.S. Patent Office to provide a reference with a difficult to read page and then refuse to consider the same reference and page when Applicants provide it back to the Patent Office for a related application. Applicants respectfully request that the Examiner consult with U.S. Patent Examiner Jason D. Mitchell (the Examiner of 10/047,312) in Art Unit 2124 for a better copy of page 72 of this reference. If a better copy of this reference is obtained, Applicants respectfully request that the Examiner send Applicants the easier to read copy of the reference. In light of the above, Applicants respectfully request that the Examiner re-consider the Schmidt

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reference and signify such consideration on Applicants' newly filed Information Disclosure Statement.

IV. 35 U.S.C. § 103: Obviousness

The Examiner rejected claims 1 - 25 under 35 U.S.C. § 103 as being obvious over an article titled "WBEM on Sun Developer's Guide" by Sun Microsystems, Inc. (hereinafter "Sun WBEM") in view of U.S. Patent 5,635,918 to Tett (hereinafter "TETT"). Applicants note that claims 3 and 17 were previously cancelled, therefore Applicants assume that the Examiner meant to reject claims 1, 2, 4-16, and 18-25 as being obvious over Sun WBEM in view of Tett. Applicants respectfully traverse the rejections.

A. Burden

The Office bears the burden of establishing a *prima facie* case of obviousness based on the prior art when rejecting claims under 35 U.S.C. § 103. *In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). The Examiner has failed to meet that burden for the following reasons.

B. References must teach or suggest all elements of the rejected claims

For an invention to be prima facie obvious, the prior art must teach or suggest all claim limitations. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970).

1. Independent Claims (1, 8, 15, and 22-25):

Applicants' independent claims 1, 8, 15, and 22-25 are directed towards a method/information handling system/program product for generating display names for management definition data elements, and each of these claims include the limitations of:

- receiving an element identifier;
- retrieving a name from a management data definition, wherein the retrieved name is a non-instance name if it is determined that an element corresponding to the element identifier is a non-instance element and wherein the retrieved name is an instance name if it is determined that the element corresponding to the element identifier is an instance element;
- displaying the retrieved name on a display device;

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- locating a qualifier corresponding to the retrieved name;
- reading a qualifier value corresponding to the qualifier; and
- replacing the retrieved name with the qualifier value prior to the displaying.

With respect to claim 1, the rejection of which is representative of the rejections of the other claims, the Examiner stated:

> In regard to claim 1, Sun WBEM discloses:
>
> *A method* (page 25: "Navigating in CIM Workshop") *of generating display names for management definition data elements, said method comprising:*
>
> *receiving an element identifier* See bottom of page 25:
>
> When you first start CIM WorkShop, the classes of the CIM Schema display hierarchically in the left side of the SIM WorkShop window. This arrangement of classes is referred to as the class inheritance tree. When you select a class, its associated properties are listed in the right side of the window. (emphasis provided by Examiner)

Applicants respectfully disagree with the Examiner's assertion that Sun WBEM's teaches Applicants' retrieval of an "element identifier." Instead, Sun WBEM teaches the selection of a "class." As known by those skilled in the art of object-oriented programming, a "class" is separate and distinct from "objects" (i.e., elements). A "class" is reusable and defines the data that is handled. An "object" is an instance of the class. As "classes" are reusable, multiple "objects" can be instantiated from the class, however classes themselves are not instance elements, they are only used to create instance elements. Each of the instantiated elements are characterized by a unique identifier that corresponds to the element. In Applicants' limitation, the data received is the "element identifier." In other words, Applicants' limitation receives an identifier that identifies a particular element. The element claimed by Applicants may or may not be an instance element. On the other hand, Sun WBEM only teaches selection of a particular "class" of objects and does not teach or suggest a lower granularity of selecting a particular instantiated object that was created based upon a given class.

Applicants therefore respectfully submit that Sun WBEM does not teach or suggest "receiving an element identifier," as claimed by Applicants. Applicants other claim limitations are based upon starting with a received "element identifier." Because Sun WBEM does not teach or suggest selecting or receiving an "element identifier," if follows that it is highly unlikely that

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Sun WBEM teaches or suggests Applicants' remaining limitations. As discussed below, this is indeed the case.

Applicants' next limitation, "retrieving a name from a management data definition, wherein the retrieved name is a non-instance name if it is determined that an element corresponding to the element identifier is a non-instance element and wherein the retrieved name is an instance name if it is determined that the element corresponding to the element identifier is an instance element" is also not taught or suggested by Sun WBEM. Indeed, as discussed above, Sun WBEM only teaches selection of a "class" and therefore, by definition, does not teach or suggest retrieving a name that could correspond to an "instance" element, as taught and claimed by Applicants. Indeed, on the last sentence of page 6 of the Final Office Action, the Examiner admits that a "class" is a non-instance element.

However, the Examiner contends that Sun WBEM also teaches the second aspect of this limitation, "wherein the retrieved name is an instance name if it is determined that the element corresponding to the element identifier is an instance element." As shown above, the Examiner has admitted that the data received ("selected") in the Sun WBEM reference is a "class" and that a class is "inherently a non-instance element." Instead, the Examiner points to page 36 of Sun WBEM that states "If the selected class has instances, the instances are displayed in the left frame of the Instances window." However, the "retrieved name" for an instance element in Sun WBEM does not correspond to Sun WBEM's "element identifier." Instead, Sun WBEM teaches that an entire class of instantiated objects is "displayed" to the user.

The final three limitations of Applicants' claims relate to providing national language support (NLS) to a user. For example, if a user's national language is "French," these limitations allow for the retrieved name to be replaced with a French qualifier value. The limitations are as follows:

locating a qualifier corresponding to the retrieved name;

reading a qualifier value corresponding to the qualifier; and

replacing the retrieved name with the qualifier value prior to the displaying.

The "qualifier" identifies the retrieved name and is used to locate the "qualifier value" that corresponds to the retrieved name. Continuing our example, if the retrieved name is the word "window," Applicants' limitations would locate a qualifier corresponding to "window,"

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read a qualifier value corresponding to the located qualifier and find that the French word "Fenêtre" should be displayed instead of the English retrieved name "Window." Then the "retrieved name" would be replaced with the qualifier value, substituting "Fenêtre" for "Window," prior to displaying the retrieved name. So, in Applicants' claimed invention, a French speaking user would see "Fenêtre" instead of "Window" on the display because of the last three limitations of the independent claims.

Sun WBEM simply does not provide any National Language Support (NLS) as taught and claimed by Applicants. The Examiner contends that Sun WBEM teaches "locating a qualifier corresponding to the retrieved name" and "reading a qualifier value corresponding to the qualifier," however the qualifiers taught by Sun WBEM are not analogous to those taught and claimed by Applicants. Applicants qualifier values are used in place of the retrieved name because Applicants' limitations are being used to provide National Language Support. Sun WBEM, on the other hand, teaches qualifiers such as data types and values that are not used to replace the retrieved name because they are not being used to provide National Language Support.

While the Examiner admits that Sun WBEM does not teach or suggest *replacing the retrieved name with a qualifier value prior to displaying*, the Examiner points to Tett as teaching this limitation. However, TETT does not teach or suggest providing the type of national language support taught and claimed by Applicants by "replacing a retrieved name with a qualifier value." Instead, TETT teaches a technique of receiving a text message containing condensed content in a wireless receiver and expanding the message into a full-text version once the message is received:

> A method and apparatus for controlling message delivery to wireless receiver devices can be used for example to condense textual messages intended for a wireless receiver device by abbreviating various words in the message. Thus, a first message addressed to a wireless receiver device (20) is received and stored in a storage medium (14). The received message is then translated into a second message using a pre-defined dictionary associated with the wireless receiver device. The second message is then sent to the wireless receiver device. Thus, the wireless receiver device receives shorter messages conveying the same information as the original message that was to be sent to the wireless receiver device. The translating feature can also be used to code messages or translate messages into a different language. [TETT, Abstract].

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While TETT clearly performs the task of expanding abbreviated words in a wireless text message into full-text versions of those words, as shown above, nowhere does TETT teach or suggest replacing a name retrieved from a management data definition with a qualifier value. TETT teaches the expansion of abbreviated *wireless text messages*, not names that are retrieved from a management data definition, as recited in Applicants' claims.

Further, TETT does not teach replacing the text of such messages with *qualifier values*, as recited in Applicants' claims, either. TETT teaches replacing abbreviations with the full-text equivalents of those abbreviations. Applicants respectfully submit that the Examiner has not met his *prima facie* burden of demonstrating how the full-text expansions of abbreviated words in a wireless message constitute *qualifier values*.

Moreover, the TETT wireless messages are not *retrieved*, as in the presently claimed invention. TETT's wireless receiver passively receives messages from wireless transmitters and does not actively seek out and retrieve information. Thus, Applicants fail to see, even under the broadest reasonable interpretation of Applicants' claims, how TETT could be construed as teaching or suggesting Applicants' claimed feature of replacing a *retrieved name*.

Applicants have overcome the rejections of claims 1, 8, and 15. The remaining independent claims (22-26 and 28) each include one or more limitations in common with claims 1, 8, and 15 and not taught by the combination of Sun WBEM in view of Tett, as described above. In addition, the remaining dependent claims are each allowable as each depends directly or indirectly on an allowable base claim.

2. *Independent Claims 26 and 28:*

Applicants independent claims 26 and 28 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Sun WBEM in view of "Common Information Model (CIM) Specification" (hereinafter "CIM Specification") in further view of "DMTF Core CIM v2.4 LDAP Mapping" (hereinafter "CIM Mapping"), both references by Distributed Management Task Force, Inc. Applicants respectfully traverse the rejections.

Each of these independent claims include limitations of:
- identifying a data element in a model of a managed system;
- constructing a display name for the data element, wherein said constructing includes:

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- ◆ determining if a pre-defined display name is associated with the data element, wherein the pre-defined display name is a qualifier value associated with the data element;

- ◆ in response to a determination that a display name is associated with the data element, constructing the display name from the pre-defined display name;

- ◆ determining if the data element corresponds to an instance in the system model;

- ◆ in response to a determination that the data element corresponds to an instance in the system model and that no pre-defined display name is associated with the data element, constructing the display name from one or more non-propagated key properties associated with the data element; and

- • displaying the display name on a display device.

The Final Office Action contends that Sun WBEM teaches the identification of elements and the construction of display names. Applicants discussed how Sun WBEM did not teach the same identification as Applicants' claimed invention in the preceding section. In addition, Applicants' "construction" of display names includes several further limitations. The Final Office Action admits that Sun WBEM does not teach or suggest these further limitations, therefore, Applicants respectfully submit that Sun WBEM does not teach or suggest Applicants' claimed "construction" of display names. However, the Final Office Action contends that the CIM Specification teaches these further limitations. As detailed below, Applicants disagree with the Examiner's position because the CIM Specification does not teach or suggest each of these limitations.

In particular, Applicants' limitation of *"in response to a determination that the data element corresponds to an instance in the system model and that no pre-defined display name is associated with the data element, constructing the display name from one or more non-propagated key properties associated with the data element"* is not taught by the CIM Specification. Indeed, in rejecting this limitation, the Examiner leaves out the important distinction of this claim limitation − namely that it is constructed from *"non-propagated key properties."* The Final Office Action paraphrased Applicants' claim as being *"in response to a determination that the date element corresponds to an instance in the system model and that no pre-defined display name is associated with the data element, construction the display name from one or more ... key properties associated with the data element."* The ellipses (...) used by the Examiner in quoting Applicants' limitation removed the word "non-propagated" from Applicants' claim. In other words, the Examiner essentially re-wrote Applicants claim removing

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an essential term ("non-propagated") in order for the limitation to more closely align with the teachings of the CIM Specification. As quoted by the Examiner from page 53 of the CIM Specification, the reference only teaches using a propagated key ("the model path is the combination of property value pairs that are marked with the KEY qualifier").

It is clear that the CIM Specification, either alone or in combination with the other references, does not teach or suggest "constructing the display name from one or more non-propagated key properties associated with the data element." Instead, as described above, the CIM Specification teaches the *exact opposite*. Namely, the name displayed in the CIM Specification is a *propagated key property*. This limitation is in both claims 26 and 28, therefore these claims are allowable over the references for at least this reason. Claim 27 depends on claim 26 and is allowable for at least this reason. In addition, claim 27 is independently allowable for the reasons set forth in section 4, below.

3. *Dependent Claims 4, 11, and 18:*

Dependent claims 4, 11, and 18 are allowable because they depend upon allowable base claims, as set forth in the preceding section. In addition, each of these claims are independently allowable because they provide additional limitations that are not taught or suggested by the prior art. These limitations include:

- searching a translation file for a translated string that corresponds to the retrieved name; and
- replacing the retrieved name with the translated string prior to the displaying.

In the Final Office Action, the Examiner admits that Sun WBEM does not teach or suggest these limitations. Instead, the Examiner points to Tett as teaching these limitations. Applicants respectfully disagree and traverse the rejections.

TETT does not teach or suggest replacing a retrieved name with a qualifier value. TETT teaches a technique of receiving a text message containing condensed content in a wireless receiver and expanding the message into a full-text version once the message is received:

> A method and apparatus for controlling message delivery to wireless receiver devices can be used for example to condense textual messages intended for a wireless receiver device by abbreviating various words in the message. Thus, a first message addressed to a wireless receiver device (20) is received and stored in a storage medium (14). The received

message is then translated into a second message using a pre-defined dictionary associated with the wireless receiver device. The second message is then sent to the wireless receiver device. Thus, the wireless receiver device receives shorter messages conveying the same information as the original message that was to be sent to the wireless receiver device. The translating feature can also be used to code messages or translate messages into a different language. [TETT, Abstract].

While TETT clearly performs the task of expanding abbreviated words in a wireless text message into full-text versions of those words, as shown above, nowhere does TETT teach or suggest replacing a name retrieved from a management data definition with a qualifier value. TETT teaches the expansion of abbreviated *wireless text messages*, not names that are retrieved from a management data definition, as recited in Applicants' claims.

Further, TETT does not teach replacing the text of such messages with *qualifier values*, as recited in Applicants' claims, either. TETT teaches replacing abbreviations with the full-text equivalents of those abbreviations. Applicants respectfully submit that the Examiner has not met his *prima facie* burden of demonstrating how the full-text expansions of abbreviated words in a wireless message constitute *qualifier values*.

Moreover, the TETT wireless messages are not *retrieved*, as in the presently claimed invention. TETT's wireless receiver passively receives messages from wireless transmitters and does not actively seek out and retrieve information. Thus, Applicants fail to see, even under the broadest reasonable interpretation of Applicants' claims, how TETT could be construed as teaching or suggesting Applicants' claimed feature of replacing a *retrieved name*.

4. Dependent Claim 27:

Claim 27 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Sun WBEM in view of the CIM Specification in view of CIM Mapping and further in view of Tett. Applicants respectfully traverse the rejection.

Claim 27 depends on claim 26 and is therefore patentable because it depends on an allowable claim, as set forth in section 2, above. Furthermore, claim 27 adds the limitation of *"wherein determining if a pre-defined display name is associated with the data element includes determining if a pre-defined display name in a designated natural language is associated with the data element,"* which is not taught in any of the references. The Final Office Action admits

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that Sun WBEM does not teach this limitation. However, the Final Office Action contends that Tett teaches this limitation. Applicants respectfully disagree.

The Examiner avers that Tett teaches "replacing one string, or name, with another." (page 13, para. 13 of Final Office Action). However, this is not the limitation set forth in claim 27. In claim 27 a determination is made as to whether "a pre-defined display name in a designated natural language is associated with the data element" as well as a determination as to whether "a pre-defined display name is associated with the data element." Tett does no such determinations. Instead, Tett receives a wireless transmission with a compressed message and simply expands the compressed message to a second message (see Tett, Abstract). While Tett does teach that some wireless messages can be translated from one language to another using a custom dictionary, Tett does not teach or suggest "determining if a *pre-defined display name* is associated with the data element," nor does Tett teach or suggest "determining if a *pre-defined display name* in a designated natural language is associated with the data element." Being a simple, wireless translation mechanism, Tett does not teach or suggest any pre-defined display names. Instead, Tett simply translates a wireless message using a custom dictionary without teaching or suggesting use of any pre-defined display names. Furthermore, as set forth in the next section, Applicants' disagree with the Examiner's characterization of Tett being "analogous art" to the other references. Applicants have therefore overcome the rejection of dependent claim 27.

C. The prior art must provide some motivation or incentive to combine the references so as to achieve the claimed invention

In response to Applicants' argument that there is simply no motivation, found in the references themselves, to combine the teachings of Sun WBEM with those of Tett, the Examiner states that "both ... are involved in the display of information." Sun WBEM provides a description of using Web-Based Enterprise Management (WBEM), which is described as both an initiative and a technology (see page 3). Included in Sun WBEM are topics regarding WBEM, the Common Information Model (CIM), Managed Object Format (MOF), and CIM and Solaris. Nowhere does the Sun WBEM reference teach or suggest using any wireless transmissions. On the other hand, Tett teaches a method and apparatus for controlling message delivery to wireless receiver devices so that condensed messages can be sent to a wireless receiver and, once at the receiver, expanded into a second message (see Tett, Abstract). Nowhere does Tett teach or suggest using his method and apparatus with a system such as the WBEM system, nor does Tett

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ever refer to using his system and method in conjunction with CIM or MOF technology. Applicants respectfully submit that there is no motivation to combine the references simply because both Sun WBEM and Tett teach something to do with "displaying information." Indeed, the type of information being processed and displayed by Sun WBEM (CIM, MOF) has nothing to do with the type of information (wireless messages) being processed and displayed by Tett.

Instead, it appears that the Examiner used Applicants' claims as "guideposts" in selecting the references used to reject Applicants' claimed invention with little or no regard as to whether there truly was a plausible motivation to combine the references without benefit of Applicants' disclosure. Applicants claimed a unique way of providing national language support by retrieving a qualifier and a qualifier value, and then replacing the retrieved name with the qualifier value. The Examiner did not take into account "only knowledge which was within the level of ordinary skill at the time the claimed invention was made." Instead, the Examiner obviously used "knowledge gleaned only from the applicant's disclosure" in selecting the Tett reference. Therefore, the combination Tett with the other references is improper. Accordingly, because Tett was used to reject each of Applicants' remaining claims, all of Applicants' remaining claims are allowable.

V. Conclusion

As a result of the foregoing, it is asserted by Applicants that the remaining claims in the Application are in condition for allowance, and Applicants respectfully request allowance of such claims.

Applicants respectfully request that the Examiner contact the Applicants' attorney listed below if the Examiner believes that such a discussion would be helpful in resolving any remaining questions or issues related to this Application.

Respectfully submitted,

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